

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

CR 20-77 SRN/BRT
INDICTMENT

Plaintiff,

18 U.S.C. § 875(c)

18 U.S.C. § 2261(b)

v.

18 U.S.C. § 2261A(2)

JEFFREY COLIN PURDY,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Cyberstalking)

On or about August 30, 2017, through on or about February 29, 2020, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

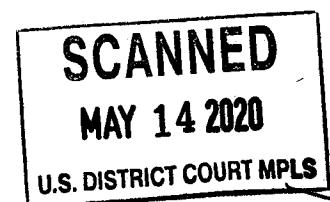
with the intent to kill, injure, harass, and intimidate another person, to wit, Victim A, did use interactive computer services, electronic communication services, and electronic communications systems of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause Victim A substantial emotional distress, all in violation of Title 18, United States Code, Sections 2261(b) and 2261A(2).

COUNT 2

(Interstate Transmission of a Threat To Injure the Person of Another)

On or about February 14, 2020, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,



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did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a Silent Witness Report sent to Minnesota State University-Mankato, and the communication contained a threat to injure the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

COUNT 3

(Interstate Transmission of a Threat To Injure the Person of Another)

On or about February 12, 2020, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a Silent Witness Report sent to Minnesota State University-Mankato, and the communication contained a threat to injure the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

COUNT 4

(Interstate Transmission of a Threat To Kidnap the Person of Another)

On or about December 10, 2019, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a Silent Witness Report sent to Minnesota State University-Mankato, and the communication contained a threat to kidnap the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

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COUNT 5

(Interstate Transmission of a Threat To Injure the Person of Another)

On or about November 30, 2019, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a Silent Witness Report sent to Minnesota State University-Mankato, and the communication contained a threat to injure the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

COUNT 6

(Interstate Transmission of a Threat To Injure the Person of Another)

On or about April 15, 2019, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a text message sent to Victim A's phone number, and the communication contained a threat to injure the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

COUNT 7

(Interstate Transmission of a Threat To Injure the Person of Another)

On or about April 12, 2019, in the State and District of Minnesota, the defendant,

JEFFREY COLIN PURDY,

did knowingly and willfully transmit in interstate and foreign commerce a communication, specifically, a Silent Witness Report sent to Minnesota State University-Mankato, and the

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communication contained a threat to injure the person of another, to wit, Victim A, all in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON